

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO RAMIREZ-VEGA,

Defendant.

Case No. 1:25-cr-42

**APPLICATION FOR AND  
FACTUAL ALLEGATIONS IN  
SUPPORT OF JUDICIAL ORDER  
OF REMOVAL**

The United States of America, by its attorneys, Jennifer Klemetsrud Puhl, Acting United States Attorney for the District of North Dakota, and Jacob T. Rodenbiker, Assistant United States Attorney, hereby respectfully applies for a judicial order of removal and alleges the following facts in support of its application and its Notice of Intent to Request Judicial Removal, providing documentary notice to Defendant and his attorney of record, Jeffrey C. Sowash, of its application and these allegations of fact:

1. Defendant is not a citizen or national of the United States.
2. Defendant is a native and a citizen of Mexico.
3. Defendant most recently entered the United States approximately 20 years ago, after March 2, 2005, across the U.S.-Mexico border in Texas, without inspection or authorization.
4. Defendant is an alien inadmissible to the United States pursuant to Title 8, United States Code, Section 1182(a)(6)(A)(i).

5. Defendant pled guilty pursuant to a Plea Agreement to the sole count of the Indictment, charging Possession of a Firearm and Ammunition by an Illegal Alien, in violation of Title 18, United States Code, Sections 922(g)(5) and 924(a)(8).

6. The maximum term of imprisonment for a violation of Title 18, United States Code, Sections 922(g)(5) and 924(a)(8), as alleged is 15 years. Given that Defendant will have pled guilty pursuant to a plea agreement to one count of Title 18, United States Code, Sections 922(g)(5) and 924(a)(8) on a date to be determined, the maximum sentence faced by Defendant for having violated the sole count of the Indictment is imprisonment for 15 years.

7. Defendant is, and at sentencing will be, subject to removal from the United States pursuant to Title 8, United States Code, Section 1182(a)(6)(A)(i).

WHEREFORE, pursuant to Section 238(c) of the INA, that is, 8 U.S.C. § 1228(c), the United States requests that this Court, at the time of sentencing, order that Defendant be removed from the United States to Mexico.

Dated: June 9, 2025

JENNIFER KLEMETSRUD PUHL  
Acting United States Attorney

By: /s/ Jacob T. Rodenbiker  
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